

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

V.

MOHAMED OMAR,
HOSSAM ABD ELGHANY, and
MOUSTAFA MAATOUK, individually
and together d/b/a Universe IPTV;
Universe TV; World-Universeiptv.com;
Uni-Update.com; and Uni-Web.online,

Defendants.

Civil Action No. 4:20-cv-02958

**PLAINTIFF DISH NETWORK L.L.C.'S MOTION FOR DEFAULT JUDGMENT
AGAINST MOHAMED OMAR AND HOSSAM ABD ELGHANY**

Pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, and the Court’s Order of August 19, 2021 (Dkt. 34), Plaintiff DISH Network L.L.C. (“DISH”) respectfully moves the Court to grant default judgment against Defendants Mohamed Omar (“Omar”) and Hossam Abd Elghany (“Elghany”) on Count I of DISH’s First Amended Complaint (“FAC”) for direct copyright infringement and on Count II of DISH’s FAC for inducing and materially contributing to copyright infringement.

DISH's motion is based upon the concurrently filed memorandum of points and authorities and the supporting declaration of Stephen M. Ferguson with Exhibits 1-6 (Dkt.35-2, Ex. A); the declarations of Stephen M. Ferguson with Exhibits 1-19, Gregory Duval with Exhibits 1-4, and Elizabeth Riemersma with Exhibits 1-2 (Dkt. 30-2, Exs. A-C);¹ the pleadings on file in this matter, and any other evidence or argument the Court may consider.

¹ These declarations were filed on August 12, 2021 in support of DISH's pending motion for default judgment against Defendant Moustafa Maatouk. (Dkts. 30, 30-2, Exs. A-C.)

DISH requests that the Court grant default judgment against Omar and Elghany on Count I of DISH's FAC for direct copyright infringement and on Count II of DISH's FAC for inducing and materially contributing to copyright infringement; award statutory damages, jointly and severally, in the total amount of \$7,050,000; and enter a permanent injunction to prevent further infringement by Omar and Elghany.²

Dated: August 20, 2021

Respectfully submitted,

HAGAN NOLL & BOYLE LLC

By: /s/ Stephen M. Ferguson

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Counsel for Plaintiff DISH Network L.L.C.

² DISH is not seeking an award of prejudgment interest or attorney's fees. A proposed final judgment and permanent injunction has been filed.